

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

JESSE DREWNIAK,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:20-cv-852-LM
	)	
	)	
U.S. CUSTOMS AND BORDER PROTECTION,	)	
et al.,	)	
	)	
Defendants.	)	
_____	)	

DEFENDANTS' MOTION TO STAY PRETRIAL PROCEEDINGS

Defendants request a stay of all pretrial proceedings, including the scheduling conference and initial disclosures, until after resolution of their dispositive motions. (*See* Document Numbers (DN) 19, 20). Defendants' potentially case-dispositive motions raise the issues of qualified immunity and standing, both of which must be decided before any further proceedings occur.

In support of this Motion, Defendants refer the Court to the attached memorandum of law and the record of this litigation.

Counsel for Plaintiffs have been contacted and do not assent to this Motion.

Therefore, Defendants request that the Court stay all proceedings preserving the effect to the qualified-immunity doctrine, which protects government officials from the burdens of litigation, including discovery, and to determine whether this Court has subject matter jurisdiction to consider the merits of Mr. Drewniak's claim for injunctive relief.

Respectfully submitted,

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